

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IAN LUCAS,

Plaintiff,

v.

VANDERBILT UNIVERSITY,

Defendant.

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No. 3:24-cv-00440

**Judge Crenshaw
Magistrate Frensley**

DECLARATION OF JEFFREY W. SHEEHAN

I, Jeffrey W. Sheehan, swear and affirm under penalty of perjury that the following statements are true and correct:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the statements herein.

2. I am a member of the Bar of the State of Tennessee, identified as #33534.

3. During my legal practice I have appeared before Judge Newbern on multiple occasions in a variety of cases without resulting in Judge Newbern's recusal.

4. On April 8, 2024, I joined the law firm of Klein Solomon Mills, PLLC.

5. On April 19, 2024, I entered an appearance in this case on behalf of Defendants Mary Ann Jessee, Michelle Tellock, Joel Newsome, Melissa Porter, G.L. Black, Neil Jamerson, Jeremy Bourgoïn, Mavis Schorn, Pamela Jefferies, E. Jacob Cummings, Jill Harris, Heather Robbins, Cate Enstrom, Angela Weaver, Mary Roy, Michael Fazi, and Feylyn Lewis ("Named Defendants").

6. The Named Defendants were dismissed on June 20, 2024.

7. I have not entered an appearance on behalf of Vanderbilt University in this action.

8. My appearance in this matter complied with my ethical obligations to uphold the integrity of this Court and was not calculated to and was not anticipated to result in Judge Newbern's recusal.

FURTHER, DECLARANT SAITH NOT.

Executed on this the 15th day of July 2024.



Signature

Jeffrey W. Sheehan

Printed Name